

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

SECOND SUPPLEMENT TO PLAINTIFF UNITED STATES'
AMENDED INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(e), the United States submits this second supplement to its amended initial disclosures, ECF No. 132-1. The disclosures are based on information and documents that are presently available or specifically known to the United States. It is anticipated that further discovery and investigation may reveal additional witnesses, information, or documents. The United States reserves the right to rely on such additional discovery and investigations and to supplement its disclosures as warranted thereby. The disclosures are made in a good faith effort to supply as much information and specification as is presently known but shall not prejudice the United States in relation to further discovery and investigations. The disclosures below reference to the categories set forth in Federal Rule 26(a)(1)(i)-(iv) and by this Court during its November 16, 2021 status conference.

Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Additional Tier 1 Individuals:

- a. Cathy Cranston, c/o Disability Rights Texas, 2222 W. Braker Lane, Austin, TX 78758. (512) 454-4816. Ms. Cranston will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.
- b. Nancy Crowther, 2102 Lewood Circle, Austin, TX 78745-3534. (512) 808-7486. Ms. Crowther will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

Date: April 26, 2022

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

PAMELA S. KARLAN
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Dana Paikowsky
T. CHRISTIAN HERREN, JR.
RICHARD A. DELLHEIM
DANIEL J. FREEMAN
DANA PAIKOWSKY
MICHAEL E. STEWART
JENNIFER YUN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2022, I served a true and correct copy of the foregoing via electronic mail on all counsel of record.

/s/ Dana Paikowsky

Dana Paikowsky

Voting Section

Civil Rights Division

U.S. Department of Justice

Dana.Paikowsky@usdoj.gov